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16 *Attorneys for Plaintiff/Counterdefendants*

17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA

19 LAS VEGAS SUN, INC., a Nevada
corporation,

20 Plaintiff,

21 v.

22 SHELDON ADELSON, an individual, and as
the alter ego of News+Media Capital Group
23 LLC, Las Vegas Review-Journal, Inc., and
Interface Operations LLC dba Adfam;
24 PATRICK DUMONT, an individual, and as
alter ego of Las Vegas Review-Journal, Inc.,
25 News+Media Capital Group, LLC, and Interface
Operations LLC dba Adfam; NEWS+MEDIA
26 CAPITAL GROUP LLC, a Delaware limited
liability company; LAS VEGAS REVIEW-
27 JOURNAL, INC., a Delaware corporation;
28 INTERFACE OPERATIONS LLC DBA
ADFAM, a Delaware limited liability company

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Case No. 2:19-cv-01667-ART-VCF

**STIPULATION AND ORDER
REGARDING SEALING PLAINTIFF'S
MOTION TO COMPEL DEFENDANTS
TO SUPPLEMENT THEIR PRODUCTION**

and as alter ego of Las Vegas Review-Journal, Inc., and News+Media Capital Group, LLC; and DOES, I-X, inclusive,

Defendants.

LAS VEGAS REVIEW-JOURNAL, INC., a
Delaware corporation,

Counterclaimant,

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LAS VEGAS SUN, INC. a Nevada corporation; BRIAN GREENSPUN, an individual and as the alter ego of Las Vegas Sun, Inc.; GREENSPUN MEDIA GROUP, LLC, a Nevada limited liability company, as the alter ego of Las Vegas Sun, Inc.,

Counterclaim Defendants.

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1 Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN
 2 GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the “Sun”), by and through
 3 their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm,
 4 and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants
 5 NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, PATRICK DUMONT, and
 6 INTERFACE OPERATIONS LLC DBA ADFAM (collectively the “RJ”), by and through their
 7 counsel of record, Kemp Jones, LLP, Jenner & Block LLP, and Richard L. Stone, Esq., hereby
 8 stipulate and agree as follows:

9 1. On March 18, 2022, the Court ordered, *inter alia*, the parties to meet and confer
 10 prior to filing any additional motions to seal. ECF No. 619.

11 2. On September 29, 2022, Lucy Crow, Esq., on behalf of the Sun, and Mona Kaveh,
 12 Esq., on behalf of the RJ, met and conferred regarding sealing relating to Plaintiff’s Motion to
 13 Compel Defendants to Supplement Their Production.

14 3. The parties agree that the following, and any references thereto, is appropriate for
 15 sealing:

- 16 • **Exhibit 2:** Excerpts of the transcript of the deposition of Stephen Hall and
 17 Exhibit 6 thereto should be filed under seal because the RJ has designated
 18 portions of the transcript “Attorneys’ Eyes Only” and “Confidential” pursuant
 19 to the parties’ Protective Order and Exhibit 6 contains sensitive financial
 20 information (ECF No. 87). Portions of the deposition transcript that were not
 21 designated “Attorneys’ Eyes Only” or “Confidential” shall be filed publicly.
- 22 • **Exhibit 4:** The attachment to Michael Gayan’s August 25, 2022, letter to the
 23 Sun should be filed under seal because the attachment contains sensitive
 24 financial information and the RJ designated it “Confidential” pursuant to the
 25 parties’ Protective Order (ECF No. 87).
- 26 • **Exhibit 7:** Excerpts of the transcript of the deposition of Chase Rankin and
 27 Exhibit 3 thereto should be filed under seal because the deposition transcript is
 28 temporarily designated as “Confidential” in its entirety pursuant to the parties’

Protective Order, and the parties have until 30 days after receipt of the deposition transcript to confirm what portions, if any, should remain “Confidential” or “Attorney’s Eyes Only.” ECF No. 87 ¶ 7(a). Given that the 30-day deadline has not run, the entirety of this exhibit is provisionally filed under seal.

DATED this 29th day of September, 2022.

DATED this 29th day of September, 2022.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

KEMP JONES LLP

By: /s/ *Nicole Scott*

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IT IS SO ORDERED:

Gejm. Q

SPECIAL MASTER

DATED: **September 30, 2022**